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December 15, 2021

**By ECF**

The Honorable Claire C. Cecchi, U.S.D.J.  
United States District Court  
Martin Luther King Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: *In re Ex Parte Application of JSC United Chemical Company Uralchem for an Order to Conduct Discovery for Use in Foreign Proceedings Pursuant to 28 U.S.C. § 1782.*  
Civil Action No. 20-3651-CCC-MF

Dear Judge Cecchi:

This firm, along with Emery Celli Brinckerhoff Abady Ward & Maazel LLP and Linklaters LLP, represents petitioner, JSC United Chemical Company Uralchem (“Uralchem”). We write in further support of Uralchem’s request to modify the briefing schedule and to reply to the letter of Lawton Lane Chemical Inc. in opposition (ECF No. 44).

Uralchem’s proposed, modified schedule offers the best compromise between allowing Lawton time to use additional information from the Irish proceedings, while limiting prejudice to Uralchem from depriving it the potential use of documents obtained here. Uralchem did not previously seek documents for use in the Irish proceedings because it had moved to dismiss those proceedings. ECF No. 37-1 at 13. Now that these proceedings are continuing, it is important for Uralchem to obtain materials here for use in Uralchem’s defense. Lawton does not deny that by December 21, 2021, the Irish plaintiffs (and Lawton too given their common control) will have obtained and considered all relevant information concerning the change of the PJSC Togliattiazot board. The two weeks proposed is ample time for Lawton to incorporate those facts, if they are relevant at all. Nor is Lawton’s invocation of its plans to delay and appeal to thwart the use of any documents in Ireland—while the Irish claimants (under common control with Lawton) press for an accelerated schedule—a justification for Lawton’s second 60-day extension. If Uralchem is successful in obtaining documents for use in the Irish proceeding, it can seek a stay in the Irish proceedings or oppose one here to ensure it is able to use them. The Court should enter a schedule here that preserves that possibility.

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We thank the Court for its attention to this matter.

Respectfully submitted,

BEVELOCK & FISHER LLC

*s/ Gregory J. Bevelock*

Gregory J. Bevelock

Encl.

c: All Counsel of Record (by ECF)